

**IN THE
UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT**

UNITED STATES OF AMERICA,)	C.A. No. 22-50093
)	
Appellee,)	D.C. No. 2:17-cr-00404-AB-2
)	(Central Dist. Cal.)
v.)	
)	GOVERNMENT’S
JOHN BRINSON JR.,)	UNOPPOSED MOTION FOR
)	EXTENSION OF TIME TO
Defendants-Appellant.)	FILE ANSWERING BRIEF;
)	DECLARATION OF RAJESH
)	R. SRINIVASAN
)	
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Appellee United States of America, by and through its counsel of record, the United States Attorney for the Central District of California, hereby moves this Court for an extension of the time within which the government must file its answering brief in the above-captioned matter. The Court has previously granted a 45-day extension of time. The government requests an additional 32-day extension of time to and including May 1, 2023. Defendant-appellant does not oppose this request.

This motion is made pursuant to Federal Rules of Appellate Procedure 26(b) and 27 and Ninth Circuit Rule 31-2.2(b) and is based on the files and records in this case and the attached declaration of Rajesh R. Srinivasan.

Defendant-appellant is in custody serving a life sentence. No court reporter is in default with regard to any designated transcript.

DATED: March 21, 2023

Respectfully submitted,

E. MARTIN ESTRADA
United States Attorney

MACK E. JENKINS
Assistant United States Attorney
Chief, Criminal Division

/s/ Rajesh R. Srinivasan

RAJESH R. SRINIVASAN
Assistant United States Attorney
Criminal Appeals Section

Attorneys for Appellee
UNITED STATES OF AMERICA

DECLARATION OF RAJESH R. SRINIVASAN

I, Rajesh R. Srinivasan, hereby declare and state as follows:

1. I am an Assistant United States Attorney in the Central District of California.
2. I am responsible for preparing the government's answering brief in *United States v. John Brinson Jr.*, C.A. No. 22-50093.
3. The government has previously sought and received a 45-day extension of its deadline for filing its answering brief, which is currently due on March 30, 2023.
4. Although I have exercised diligence with respect to this appeal and will continue to do so, I do not anticipate being able to complete the government's answering brief by its current due date and anticipate needing an additional 32 days, through and including May 1, 2023, because I have a full slate of appellate, trial, and investigatory work.
5. I am responsible for the government's consolidated answering brief in *United States v. Edgar Hernandez Lemus and Junior Almendarez Martinez*, CA Nos. 22-50046 & 22-50051. I also represent the government in ongoing prosecutions, including *United States v.*

Andrade, DC No. 22-CR-314-JFW, *United States v. Perez-Martinez*, DC No. 21-CR-544-MCS, *United States v. Barnett*, DC No. 22-105-ODW, *United States v. Khalatyan*, DC No. 22-CR-345-DMG, and *United States v. Uriarte-Rios*, DC No. 22-CR-381-RGK. I am responsible for representing the government at sentencing in *United States v. Sanchez*, DC No. 22-cr-266-FMO, *United States v. Garcia-Gomez*, DC No. 22-cr-247-SB, *United States v. Ortali*, DC No. 22-141-JLS, *United States v. Condito*, DC No. 22-CR-272-SB, and *United States v. Chung*, DC No. 19-CR-765-JAK. In addition to these post-indictment cases, I manage a significant number of ongoing investigations.

6. On March 21, 2023, defendants-appellant's counsel, Verna Wefald, informed me that she does not oppose this motion.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. EXECUTED on March 21, 2023, in Los Angeles, California.

/s/ Rajesh R. Srinivasan
RAJESH R. SRINIVASAN
Assistant United States Attorney